## EFFICACY REVIEW

DATE: IN<u>11- 5-01</u> OUT<u>11-30-01</u>

FILE OR REG. NO	)	7296	9-E				
PETITION	ETITION OR		EXP.		PERMIT		
 DATE DIV. RECE	IVED	October 2, 2001					
DATE OF SUBM	MISSION _				October	1,	2001
 DATE	SUBMISSION			ACCEPTED			
	CT(S):	(I,)D,	Н,	F,	N,	R,	S
 DATA ACCESSION :	NO(S). <u>455</u>	112-06;D2	78978;S	605233	;Case#0712	233;A	C:165
PRODUCT MGR.	NO				03-Layı	ne/De	Luise
PRODUCT NAME(S) SHP-2002							
COMPANY NAME	Sta	r Horse P	roducts	, Inco	rporated		
SUBMISSION PUR	POSE <u>Provi</u>	de perfor	mance d	<u>lata ir</u>	n support	of c	laims
_	for re	epellency	of horn	fly, i	face fly,	stab]	le fly
	and h	ouse fly	from h	orses	for up to	) 2 w	eeks.
_ CUEMICNI ( EODM	III ATTON Do	rmothrin.	(2 pho	nowynh	oniil\mothi	( . )	aia/

CHEMICAL & FORMULATION Permethrin:  $(3-phenoxyphenyl)methyl(\pm)cis/-trans 3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate* *Cis/trans isomer ratio; 45.00% Maximum 55%(<math>\pm$ ) cis,  $\pm$  1 cis,  $\pm$  2 cc applicators of ready-to-use liquid)

Minimum 45%(±) trans

CONCLUSIONS & RECOMMENDATIONS The data presented in EPA Accession \_(MRID) Number 455112-06, having been obtained from a standard field test meeting the requirements of § 95-8(a)(1) to (5)(viii) on pp. 255-6 and (6) through (8) on pp. 257-8 and meeting the standard of § 95-8(b)(2)(iii) on p. 261 of the Product Performance Guidelines, and conducted according to the GLP requirements of 40 CFR 160 with noted exceptions, are adequate to demonstrate the ability of the subject product to repel horn fly, Haematobia irritans, stable fly, Stomoxys calcitrans, and house fly, Musca domestica, for a period of up to 2 weeks following application by means of a specially designed applicator to horses according to label directions. The 12 ml dose of the subject product produced acceptable horn fly con- trol through 28 days, with repellency hovering slightly below or slightly above the standard of 90% at every observation except 9 days and 14 days. It was noted that these peaks occurred around or on the days prior to the second application on day 14, and that following the second application, numbers of horn (to be continued) fly remained at an acceptable level to the 28th day when the test was terminated. By contrast, with the 9 ml dose of the subject product, no acceptable level of repellency was produced until after the second application, and was not maintained to even the second observation following final application, on day 19.

Even the 12 ml dose of the subject product produced only marginally acceptable repellency of stable fly, with control level being approached or exceeded on only 3 of 11 dates, with almost no repellency being noted on 4 separate dates. Again, the highest level was achieved following the second application. By contrast, the 9 ml dose produced no acceptable level of repellency until the observation immediately following the second application, which was not maintained to even the second observation on day 19. Again, almost no repellency was noted on 4 separate dates.

Both the 9 ml and 12 ml doses of the subject product produced an acceptable level of repellency to house fly on the face and head early in the test, with the 12 ml dose approaching control level before the second application, and achieving the highest degree of control noted in the test immediately following second application. Even the 9 ml dose continued a fairly high degree of repellency just before second application, which was maintained at every ob- ervation through day 19 except day 9, with control level being ap- proached following second application.

In observations of house fly repellency on the body of horses, only the 12 ml dose of the subject product produced any level of repellency except at the initial observation when both doses had the best results noted throughout the test. The 9 ml dose reached a second peak of repellency following the second application, but this was not sustained to even the next observation on day 16. Also, virtually no repellency was observed on 5 of 11 days when counts were made. The 12 ml dose was only slightly better, with moderate repellency through day 3, a second peak following second application on day 14, and 4 of 11 days when virtually no repellence cy was noted.

In summary, the 9 ml dose, which is the only rate on the label for the subject product, will not give satisfactory repellency of horn fly, stable fly, or house fly (on the body of horses); the 12 ml dose will give control of horn fly throughout a two-week period or longer, as well as fairly high repellency of stable fly and house fly (on face and head of horses) and a higher repellency of house fly (on the body of horses) than the 9 ml dose. This higher dose will support the front panel claims "For Biting Fly Protection" and "Kills and Repels Horn Flies, Face Flies, Stable Flies and House Flies for Up to Two Weeks". We recommend the registrant revise application directions to use the higher dose in all cases except house fly repellency for the face and head of horses. The applicator should be redesigned to hold 12 ml each or the number of applicators increased to 3 containing 8 ml each.

ΙB